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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

In Re Bard IVC Filters Products Liability
Litigation

No. MD-15-02641-PHX-DGC

LISA HYDE and MARK HYDE, a
married couple,

Plaintiff,

v.

C.R. BARD, INC., a New Jersey
corporation and BARD PERIPHERAL
VASCULAR, an Arizona corporation,

Defendants.

**PLAINTIFFS' PROPOSED VERDICT
FORM**

(Assigned to the Honorable David G.
Campbell)

In accordance with the Court's Order dated July 13, 2018 (Doc. 11872), Plaintiffs
hereby submit their proposed Verdict Form.

We, the jury empaneled and sworn in the above action, upon our oaths, find as
follows:

A. LIABILITY 1. Strict Product Liability Design Defect Claim (Reference WI JI-
CIVIL 3209.1)

1 1. When the Filter left the control of the Bard Defendants and reached Ms. Hyde,
2 was it in such a defective condition as to be unreasonably dangerous to Ms. Hyde?

3 _____Yes _____No
4

5 2. If you answered “yes” to Question No. 1, then answer this question. Otherwise
6 do not answer it. Was the defective condition a cause of the injury?

7 _____Yes _____No
8

9 3. Were the Bard Defendants negligent?

10 _____Yes _____No
11

12 4. If you answered “yes” to Question No. 3, then answer this question. Otherwise
13 do not answer it. Was the negligence a cause of the injury?

14 _____Yes _____No
15

16 B. DAMAGES-(Reference WI JI_CIVIL 1700,1750.1)

17 You must answer the following damage questions no matter how you answered any
18 of the previous questions in the verdict. The amount of damages, if any, found by you
19 should in no way be influenced by how answered any previous questions in the verdict.
20

21 5. Did Mr. Hyde sustain a loss of consortium?

22 _____Yes _____No

23 6. What sum of money will fairly and reasonably compensate the Plaintiffs with
24 respect to:

25 (a) Past health care expenses? \$_____

26 (b) Future health care expenses? \$_____

27 (c) Past pain, suffering and disability? \$_____

28 (d) Future pain, suffering and disability? \$_____

(e) Loss of consortium \$_____

C. PUNITIVE DAMAGES (Reference WI JI_CIVIL 1707.2)

7. Did the Bard Defendants act maliciously toward Ms. Hyde or in an intentional disregard of the rights of Ms. Hyde?

_____Yes _____No

If you answered the previous question “yes”, answer this question:

8. What sum, if any, do you award against the Bard defendants as punitive damages?

Answer: \$_____

Presiding Juror Number

Date

RESPECTFULLY SUBMITTED this 28th day of August, 2018.

GALLAGHER & KENNEDY, P.A.

By: /s/ Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine